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## IN THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

No. 23-4693

UNITED STATES OF AMERICA,

Plaintiff - Appellee,

v.

ARBAB SALEEM,

**Defendant - Appellant.** 

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Pursuant to the Federal Rules of Appellate Procedure, Arbab Saleem, respectfully requests this Court to extend the deadline to file the Reply Brief by 4 days, from June 3, 2024 through June 7, 2024. In support of this Motion, Mr. Saleem offers the following:

- 1. Counsel is court-appointed.
- 2. Mr. Saleem is incarcerated and difficult to get in touch with. Counsel needs a brief extension to facilitate communication with Mr. Saleem before filing this brief.
- 3. Most problematically, last week, counsel's senior associate unexpectedly resigned from the firm, causing counsel to have to take over an additional complete caseload. Counsel's firm is small, and there is no other lawyer with the experience necessary to take over the caseload than the undersigned. Although counsel diligently has worked extremely long hours to address this issue, the resignation has presented significant challenges to counsel's schedule.

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4. The government does not oppose the relief requested in this Motion.

WHEREFORE, Mr. Saleem respectfully requests a short 4-day extension of the deadline by which to file his Reply brief, up to and including June 7, 2024.

Respectfully submitted, this 3rd day of June, 2024.

/s/ William R. Terpening William R. Terpening N.C. Bar 36418

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Counsel for Arbab Saleem

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## **CERTIFICATE OF SERVICE**

I certify that I have filed this **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** through the Court's ECF system, which constitutes service on all parties.

Dated: June 3, 2024.

<u>/s/ William R. Terpening</u> William R. Terpening